

Attorney Name, Address, Telephone & FAX Numbers State Bar Number & Email Address Joshua L. Sternberg 250687 Sternberg Law Group 8605 Santa Monica Blvd., Suite #81823 West Hollywood, CA 90069-4109 310-270-4343 Fax: 310-270-4344 250687 CA JS@STERNBERGLAWGROUP.COM	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA	
In re: Stephen M Pantalemon	CASE NUMBER: 8:23-bk-11752-MH CHAPTER 13
Debtor(s).	APPLICATION OF ATTORNEY FOR DEBTOR FOR ADDITIONAL FEES AND RELATED EXPENSES IN A PENDING CHAPTER 13 CASE SUBJECT TO A RIGHTS AND RESPONSIBILITIES AGREEMENT (RARA) [11 U.S.C. § 330(a)(4)(B); LBR 3015-1(v)(2)]

TO DEBTOR, CHAPTER 13 TRUSTEE, AND PARTIES IN INTEREST:

- Rights and Responsibilities Agreement.** The undersigned Attorney and Debtor are parties to a Rights and Responsibilities Agreement (RARA) filed as docket number 11.
- RARA Fee Agreement** Pursuant to the RARA, Debtor agreed to pay Attorney (i) a flat fee of \$ 5,000.00 for those services identified in boldface type in the RARA (Basic Services) and (ii) an hourly fee of \$ 450.00 per hour, or a reasonable flat fee, for services other than the Basic Services (Additional Services).

(If the RARA contains any other or different provisions regarding fees for Additional Services, Attorney must (i) check this box ☐ and (ii) attach an addendum providing the details.)
- Request for Additional Fees.** Pursuant to 11 U.S.C. § 330(a)(4)(B) and LBR 3015-1(v)(2), Attorney requests allowance and payment of the following:

*"Bankruptcy Code" and "11 U.S.C." refer to the United States Bankruptcy Code, Title 11 of the United States Code.
"FRBP" refers to the Federal Rules of Bankruptcy Procedure. "LBR" and "LBRs" refer to the Local Bankruptcy Rule(s) of this court*

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Fees for Additional Services	\$ <u>2,295.00</u>
Expenses related to Additional Services	\$ <u>0.00</u>
Total	\$ <u>2,295.00</u>

4. **Case Status.** This Chapter 13 case has not been dismissed or converted.

5. **Plan Status.**

- ☐ A Chapter 13 Plan was confirmed in this case by order entered as docket number ____.
- ☒ A Chapter 13 Plan has not yet been confirmed in this case; a hearing is set for (date) 01/11/2024.

6. **Fee Award for Basic Services.**

- ☒ Attorney was awarded fees for Basic Services in the amount of \$ 2,500.00 in the order confirming the plan and/or a separate order of the court.

7. **Prior Applications for Additional Fees.**

- ☒ Attorney has not previously applied for Additional Fees in this case.
- ☐ Attorney has previously applied for Additional Fees in this case. A total of \$ _____ has been awarded to Applicant for Additional Fees pursuant to prior requests.
- ☐ One or more applications for Additional Fees in this case are pending. See docket number(s) _____.
A total of \$ _____ in Additional Fees has been requested pursuant to those pending applications.

8. **Disclosure of Amounts Previously Paid To Attorney.** Pursuant to LBR 3015-1(v)(2), Attorney discloses the following amounts paid to date (including prepetition payments) by Debtor or the Chapter 13 Trustee to Attorney and the source of those payments:

Date Received	Amount Received	Source of Payment
TOTAL		

9. **Amount and Basis for Compensation Requested.**

- A. ☐ **Presumptively Reasonable Fees (No Look Fees).** Attorney requests an award of fees for Additional Services identified in the following table; these amounts are equal to or less than the maximum No Look Fee specified in Section 2.9(b) of the Court Manual for those services.

(If you are requesting fees for more than one instance of the same type of service, you must provide the pertinent details in the "Explanation" box or in an addendum.)

Fee Requested	Maximum No Look Fee	Legal Service	Docket No.
\$	\$750.00	Unopposed motion to extend/impose automatic stay	
\$	\$350.00	Unopposed application for order shortening time	

Fee Requested	Maximum No Look Fee	Legal Service	Docket No.
\$	\$1,250.00	Unopposed motion to avoid lien (11 U.S.C. § 506(a))	
\$	\$1,500.00	Unopposed motion to avoid lien (11 U.S.C. § 506(a)), with stipulation and order	
\$	\$750.00	Unopposed motion to avoid lien (11 U.S.C. § 522(f))	
\$	\$950.00	Unopposed motion to disallow claim	
\$	\$350.00	Opposition to Chapter 13 Trustee's motion to dismiss or convert case	
\$	\$750.00	Unopposed motion to modify plan	
\$	\$750.00	Unopposed motion to refinance/sell real property	
\$	\$750.00	Unopposed motion to incur debt	
\$	\$300.00	Application for order confirming that loan modification discussion does not violate the automatic stay	
\$	\$2,000.00	Complaint to avoid lien	
\$	\$2,500.00	Loan Modification Management Fees and Costs	
\$		Total Requested	

B. ☒ Hourly or Other Additional Fees. Attorney requests an award of fees for Additional Services on an hourly or other basis.

a. Dates during which the Additional Services were provided: from (dates) 10/12/2023 to 01/10/2024.

b. Summary of hourly fees requested for the Additional Services.

Name	Attorney or Paralegal?	Hourly Rate	Hours Billed	Total Requested
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
Total				

c. Description of the nature, necessity, and results of the Additional Services for which hourly fees are requested in this Section 10.B: (Check here ☒ if an addendum containing additional information is attached.)

d. A billing statement is attached as Exhibit A, identifying each service performed, the service provider, the date rendered, the time spent, and the amount billed (*required*).

e. If fees for the Additional Services are requested other than on an hourly basis, the amount requested and the basis for that request are as follows:

10. **Expenses.** Attorney requests an award of expenses incurred in connection with the Additional Services in the amounts summarized in the following table.

Expense Category	Amount Requested
	\$
	\$
	\$
	\$
	\$
	\$
	\$
TOTAL	\$

Additional Explanation: (Check here ☐ if an addendum containing additional information is attached.)

(Note: If you are requesting the allowance of expenses related to No Look Fee services, you must explain above why the requested expenses are extraordinary.)

11. **Request for Payment.**

- ☒ Attorney requests that all fees and expenses allowed hereunder be awarded and paid by the Chapter 13 Trustee through the plan that has been or may be confirmed in this case.
- ☐ Attorney requests that the fees and expenses allowed hereunder be awarded and paid in the following manner (*specifically describe the proposed source(s) of payment and the proposed timing of that payment*):

12. **Consent and Declaration of Debtor.**

CONSENT AND DECLARATION OF DEBTOR(S)

The undersigned Debtor declares that s/he has reviewed the foregoing Application and consents to approval of payment of the fees and expenses requested by Attorney.

Executed this 10th day of January 2024 at (city) Santa Ana (state) CA

Signature of Debtor 1: 

Printed name of Debtor 1: Stephen M Pantalemon

Signature of Debtor 2: _____

Printed name of Debtor 2: _____

13. **Certifications of Counsel.**

a. **No Prior Request.** I certify that Attorney has not previously requested fees or expenses for any of the Additional Services that are the subject of this Application. If I cannot make this certification, I have checked this box ☐ and attached an addendum that discloses the details of that prior request.

b. **No Debtor Consent and Declaration.** If the Debtor has not executed the Consent and Declaration in Paragraph 12, the reason the Debtor has not done so is as follows:

c. **True and Correct.** I certify that the information contained in and attached to this Application is true and correct.

Date: January 10, 2024

Respectfully submitted,

/s/ Joshua L. Sternberg

Signature of Attorney for Debtor

Joshua L. Sternberg 250687

Printed name of Attorney for Debtor

STERNBERG LAW GROUP

8605 Santa Monica Blvd

Ste Pmb 81823

West Hollywood, CA 90069-4109

TELEPHONE (310) 270-4343

FACSIMILE (310) 270-4344

Stephen M Pantalemon
35 Hallcrest Dr
Ladera Ranch, CA 92694
ORANGE-CA

10-Jan-24

Reference To: Stephen M Pantalemon, Chapter 13 BK Case No.: 8:23-bk-11752-MH

STATEMENT OF CHARGES THROUGH October 12, 2023 - January 10, 2024 billed by Sternberg Law Group AKA SLG

PROFESSIONAL SERVICES

10/12/2023	SLG	Phone Appointment with Client to Discuss Objecting to the Claim of Moorfield Construction	1	450.00
10/17/2023	SLG	Phone Appointment with Client to Discuss Objecting to the Claim of Moorfield Construction	0.7	315.00
11/10/2023	SLG	Phone Appointment with Debtor and his State Court Attorney to discuss Objecting to the Claim of Moorfield Construction	0.9	405.00
11/10/2023	SLG	Phone Appointment with Creditor Attorney to discuss Objecting to the Claim of Moorfield Construction	0.5	225.00
11/14/2023	SLG	Phone Appointment with Debtor and his State Court Attorney to discuss Objecting to the Claim of Moorfield Construction	0.5	225.00
11/30/2023	SLG	Phone Appointment with Client to Discuss Objecting to the Claim of Moorfield Construction	0.5	225.00
11/30/2023	SLG	Phone Appointment with Creditor Attorney to discuss Objecting to the Claim of Moorfield Construction	0.5	225.00
12/6/2023	SLG	Phone Appointment with Client to Discuss Objecting to the Claim of Moorfield Construction	0.3	135.00
1/10/2024	SLG	Prepare Fee app	0.20	90.00

Hours Amount

For professional services rendered 5.10 2295.00

*No Charge/Adjustment in Billing 0.00 0.00

SUBTOTAL 2295.00

TOTAL COSTS: 2295.00

BALANCE 2295.00**FINAL BALANCE: 2295.00**

In re:
Stephen M Pantalemon

Debtor(s).

CHAPTER: **13**

CASE NUMBER: **8:23-bk-11752-MH**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**8605 Santa Monica Blvd.,
Suite #81823
West Hollywood, CA 90069-4109**

A true and correct copy of the foregoing document entitled (*specify*): **APPLICATION OF ATTORNEY FOR DEBTOR FOR ADDITIONAL FEES AND RELATED EXPENSES IN A PENDING CHAPTER 13 CASE SUBJECT TO A RIGHTS AND RESPONSIBILITIES AGREEMENT (RARA)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **01/11/2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

**US Trustee, ustpreion16.sa.ecf@usdoj.gov
Ch 13 Trustee, efile@ch13ac.com
Barrett Daffin Frappier Treder & Weiss, LLP, cdcaecf@bdfgroup.com
Katz Law, APC, lior@katzlaw.com
Mahoney & Soll LLP, r.soll@verizon.net
Ghidotti Berger LLP, kbrown@ghidottiberger.com**

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **01/11/2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**Honorable Mark D. Houle,
United States Bankruptcy Court - Central District of California
Courtroom 6C, 411 West Fourth Street,
Santa Ana, CA 92701**

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

01/11/2024

Joshua L. Sternberg 250687

Date

Printed Name

/s/ Joshua L. Sternberg

Signature

Label Matrix for local noticing
0973-8
Case 8:23-bk-11752-MH
Central District of California
Santa Ana
Wed Jan 10 01:52:37 PST 2024

Moorefield Construction, Inc.
C/O Katz Law, APC
5850 Canoga Ave., Suite 400
Woodland Hills, CA 91367-6554

Apple Card/gs Bank Usa
Lockbox 6112
P.O. Box 7247
Philadelphia, PA 19170-0001

(p)CAINE & WEINER COMPANY
12005 FORD ROAD 300
DALLAS TX 75234-7262

Connexus Credit Union
Attn: Bankruptcy
Po Box 8026
Wausau, WI 54402-8026

Iq Data International
Attn: Bankruptcy
Po Box 340
Bothell, WA 98041-0340

Planet Home Lending, LLC
321 Research Parkway
Suite 303
Meriden, CT 06450-8342

Quantum3 Group LLC as agent for
Aqua Finance Inc
PO Box 788
Kirkland, WA 98083-0788

Santa margarita Water District
26111 Antonio Pkwy
Rancho Santa Margarita, CA 92688-5505

Amrane (SA) Cohen (TR)
770 The City Drive South Suite 3700
Orange, CA 92868-4928

Employment Development Dept
Bankruptcy Group MIC 92E
P.O. Box 826880
Sacramento, CA 94280-0001

(p)STATE COMP INS FUND
PO BOX 9102
PLEASANTON CA 94566-9102

Ashley Funding Services, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Credit International C
Po Box 1268
Bothell, WA 98041-1268

Moorefield Construction, Inc.
c/o Katz Law, APC
5850 Canoga Avenue, 4th Floor
Woodland Hills, CA 91367-6554

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

United States Trustee (SA)
411 W Fourth St., Suite 7160
Santa Ana, CA 92701-4500

Joshua Sternberg
Sternberg Law Group
8605 Santa Monica Blvd
Ste Pmb 81823
West Hollywood, CA 90069-4109

Franchise Tax Board
Bankruptcy Section MS: A-340
P.O. Box 2952
Sacramento, CA 95812-2952

Santa Ana Division
411 West Fourth Street, Suite 2030,
Santa Ana, CA 92701-4500

Barclays Bank Delaware
Attn: Bankruptcy
125 South West St
Wilmington, DE 19801-5014

Cmptr Chk Vr
Po Box 1268
Bothell, WA 98041-1268

Goldman Sachs Bank USA
Attn: Bankruptcy
Po Box 70379
Philadelphia, PA 19176-0379

Nordstrom FSB
13531 E. Caley Ave
Englewood, CO 80111-6505

Prestige Default Services LLC
1920 old Tustin Ave
Santa Ana, CA 92705-7811

Richard A Soll
Mahoney & Soll LLP
150 West First St #280
Claremont, CA 91711-4739

Wilmington Trust, National Association
c/o Planet Home Lending, LLC
321 Research Parkway
Suite 303
Meriden, CT 06450-8342

Stephen M Pantalemon
35 Hallcrest Dr
Ladera Ranch, CA 92694-1085

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

State Compensation Insurance Fund
P.O. Box 8192
Pleasanton, CA 94588

Caine & Weiner
Attn: Bankruptcy
5805 Sepulveda Blvd 4th Floor
Sherman Oaks, CA 91411

Chase Card Services
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850

Portfolio Recovery Associates, LLC
c/o Barclays Bank Delaware
POB 41067
Norfolk VA 23541

(d)State Compensation Insurance Fund
PO BOX 8192
Pleasanton, CA 94588

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Courtesy NEF

(u)Wilmington Trust, National Association, no

End of Label Matrix	
Mailable recipients	29
Bypassed recipients	2
Total	31